

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

OFFICE SPACE SOLUTIONS, INC.,

Plaintiff,

-against-

JASON KNEEN,

Defendant.

DECLARATION

Civil Action No.: 15CV4941(LAK)

ECF Case

HOSEIN BABAI hereby declares, under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am currently employed as the Director of Technology for the Plaintiff in this matter, and held the same position on June 24, 2014.
2. On that date, I was contacted by Harsh Mehta concerning the Work Better domain as we were involved in the launch of a business surrounding the mark Work Better. Harsh asked me to look into how to transfer the domain. I was unaware that Harsh was referring to an agreement he had that day reached in principal with the owner of workbetter.co. I assumed he was referring to workbetter.com and I initiated the transfer. Of course this was jumping the gun since Harsh asked me to simply look into the process.
3. I am aware that in order to transfer a domain, both parties must agree in electronic acceptances submitted and confirmed to the domain Registrar. I also initiated the transfer for the wrong domain, i.e. workbetter.com instead of workbetter.co.

4. I received the following text message from Harsh shortly after: "Why would you initiate the transfer when all I asked is to find out what needs to be done. I didn't even tell you what the domain was!" I texted Harsh back, "Sorry Harsh. I just kind of assumed that was the domain". I quickly cancelled the transfer request.

Dated: New York, New York
July 6, 2015



Hasain Rahai